

## REMARKS/ARGUMENT

### Regarding the Claims in General:

Claims 2-4 and 7-11 are pending. Claims 1, 5, and 6 have been cancelled, and claims 2 and 4 have amended to better highlight the distinguishing features of the invention. Claims 7-9 stand withdrawn from consideration. Claim 1 has been replaced by new claim 10 and incorporates the features of claim 5, as well as other features which better highlight the nature of the invention. Claims 2-4 are now directly or indirectly dependent on claim 10. Claim 6 has been replaced by a new independent claim 11 which also incorporates several of the features of claim 10.

### Regarding the Prior Art Rejections:

Applicants respectfully submit that the outstanding rejections under 35 U.S.C. 102 are inapplicable to claims 2-4, 10 and 11 as presently written. Preliminarily, however, applicants note with some concern, that the six pending claims were rejected as anticipated by no less than *eight* separate references. Aside from the fact that such a cumulative and redundant assault is contrary to the directive of M.P.E.P. 706.02, at least because of the resulting enormous amount of unnecessary work for both the examiner and the applicants, fully seven of the eight references, and one of the citations in the eighth reference (i.e., Tetreault et al. U.S. Patent 5,997,798), are clearly not pertinent to the actual features of the invention as described in the specification and in the present claims.

In particular, new claim 10, which has replaced claim 1, calls for:

A mold comprising:

two mold halves,

the mold including portions configured to define the shape of a cavity which receives molding material for encapsulating a semiconductor chip;

one of the mold halves including an aperture extending therethrough and

a contact member formed of a compressible material, and positioned in the aperture,

the contact member being so shaped and positioned that it is in contact with a surface of a semiconductor chip being encapsulated in the mold.

None of the eight references except Tetreault teaches a mold in which one of the mold halves includes an aperture extending therethrough with a member positioned in the aperture, the member being "so shaped and positioned that it is in contact with a surface of a semiconductor chip being encapsulated in the mold." Even the embodiment of Tetreault shown in Figs. 5 and 7, which the Examiner has employed in rejecting claims 1, 2, 5, and 6 on page 4 of the outstanding Office Action, does not show this feature.

With respect to the embodiment of Tetreault shown in Figs. 4 and 6, which the Examiner has applied only to claims 1-4, even this does not anticipate new claim 10 as it fails to show "a contact member *formed of a compressible material*". It would seem that the Examiner recognizes this deficiency in Tetreault as he did not apply Figs. 4 and 6 to the one claim (i.e., claim 5), which recited the compressibility feature. In any event, new claim 10 clearly distinguishes the present invention from the cited prior art, including Tetreault, and therefore should be allowed, along with dependent claims 2-4.

New claim 11 is also patentable over the eight cited references, including both embodiments of Tetreault. This claim is generally similar to claim 10, but does not require the contact member to be formed of a compressible material. However, claim 11 does require that the contact member be:

so shaped and positioned that a portion thereof is in contact with a portion of the surface of a semiconductor chip being encapsulated in the mold . . . ,

and that:

the portion of the contact member which is in contact with the portion of the surface of the semiconductor chip is so profiled as to minimize seepage of molding material onto the portion of the surface of the semiconductor chip during molding.

The latter feature, in combination with the other features of claim 10 noted above, clearly distinguishes over Figs. 4 and 6 of Tetreault. In this connection, it is further noted that the

Examiner appears to have recognized that the profiling of the contact member to minimize seepage is not possible in the embodiment of Figs. 4 and 6 of Tetreault. This feature was recited in original claim 6 which was not rejected over Figs. 4 and 6 of Tetreault in the outstanding Office Action.

In view of the foregoing, favorable reconsideration and allowance of this application are respectfully solicited.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on September 26, 2003:

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Name of applicant, assignee or  
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September 26, 2003

Date of Signature

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Respectfully submitted,

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